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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

OMAR ARNOLDO RIVERA MARTINEZ;
ISAAC ANTONIO LOPEZ CASTILLO; JOSUE
VLADIMIR CORTEZ DIAZ; JOSUE MATEO
LEMUS CAMPOS; MARVIN JOSUE GRANDE
RODRIGUEZ; ALEXANDER ANTONIO
BURGOS MEJIA; LUIS PEÑA GARCIA;
JULIO CESAR BARAHONA CORNEJO, as
individuals,

PLAINTIFFS,

v.

THE GEO GROUP, Inc., a Florida
corporation; the CITY OF ADELANTO, a
municipal entity; GEO LIEUTENANT
DURAN, sued in her individual capacity;
GEO LIEUTENANT DIAZ, sued in her
individual capacity; GEO SERGEANT
CAMPOS, sued in his individual capacity;
SARAH JONES, sued in her individual capacity;
THE UNITED STATES OF AMERICA; and
DOES 1-10, individuals;

DEFENDANTS.

Case No.: 5:18-cv-01125-R-GJS

**DECLARATION OF PLAINTIFF
OMAR ARNOLDO RIVERA
MARTINEZ**

*Filed concurrently with Plaintiffs'
Opposition to Defendants The Geo
Group and City of Adelanto Motion for
Summary Judgment*

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Declaration of Omar Arnoldo Rivera Martinez

I, OMAR ARNOLDO RIVERA MARTINEZ, declare as follows:

1. I have personal knowledge of the facts stated below and could testify competently to these facts if I were asked to testify as a witness.

2. From May 2017 to approximately August 2018 I was detained in ICE Custody at the Adelanto Detention Center in the city of Adelanto, California.


3. During my time at the Adelanto facility, I resided in various dorms, including dorms that I understood were named "2-Charlie," "5-Bravo," and the "segregation" dorms. I had access to and used the shower facilities in each of these dorms.

4. To turn on the shower in each of these dorms, I would have to press a button on the shower wall and water would spray from the showerhead at approximately 1-2 minute intervals. To access more water, I would have to press the button again. In each of these dorms, the water was always consistently at a hot temperature. I did not have the ability to change the water temperature to a hotter or colder temperature.

5. Each time I showered, I would briefly wet my body and quickly step away from the showerhead because I felt that the water was too hot. I would scrub myself with the soap and quickly rinse off again. This was my regular practice while I was detained at Adelanto because, in my experience, the water was always hot, regardless of which shower I used.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed this 24th day of November 2019, in Tapachula, Chiapas, Mexico.


OMAR ARNOLDO RIVERA MARTINEZ